

PRIVACY POLICY

StartupJobs.com s.r.o.

1. INTRODUCTORY INFORMATION

- 1.1. This Privacy Policy is issued by StartupJobs.com s.r.o., Company ID No.: 291 53 786, with its registered office at Šostakovičovo náměstí 1515/5, Stodůlky, 155 00 Prague 5, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, File 204709 (hereinafter referred to as “**StartupJobs**”, “**we**”, “**us**” or “**our**”).
- 1.2. This Policy sets out the principles for processing personal data of all users of the website www.startupjobs.cz and its English-language version www.startupjobs.com. By using our websites, you agree to comply with this Privacy Policy and warrant that any personal data you provide to us is accurate and that you are authorized to provide such personal data.
- 1.3. We always process personal data in accordance with this Privacy Policy. In doing so, we follow the key principles set out in Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“**GDPR**”), Act No. 110/2019 Coll. on the processing of personal data, Act No. 111/2019 Coll. amending certain laws in connection with the adoption of the Personal Data Processing Act, Act No. 480/2004 Coll. on certain information society services, and other applicable data protection laws.
- 1.4. StartupJobs acts both as a data controller and a data processor. We act as the controller when it comes to personal data you submit while creating and managing your profile. In other cases, for instance when you submit personal data to a third party via StartupJobs (e.g. in response to a job advertisement), you become the controller. StartupJobs then acts as the processor, collecting and processing such data on behalf of the Customer.
- 1.5. StartupJobs prioritizes the security of your data. All personal data is handled in full compliance with applicable laws, including the General Data Protection Regulation (GDPR). We place strong emphasis on technical and organizational measures to protect personal data throughout processing.
- 1.6. All personal data in electronic form is stored in databases and systems accessible only to those persons who need access for the purposes set out in this Policy, and only to the extent necessary. The security of the data is regularly tested by StartupJobs and continually improved.
- 1.7. The appointed Data Protection Officer at StartupJobs is:
Tereza Müllerová, support@startupjobs.cz, +420 725 875 752.

2. WHAT PERSONAL DATA WE PROCESS

- 2.1. StartupJobs always uses personal data solely for the purposes for which it was collected. Where StartupJobs acts as a data processor on behalf of advertising Customers, it may not expand the purpose for which the data was provided (i.e., responding to a job offer). This does not apply where you have given your consent to further processing, or where StartupJobs is required to do so by law.
- 2.2. We collect, process, and protect different categories of personal data depending on your relationship to StartupJobs:

User

You are a *User* if you register on our platform. A user profile is then created and personal data is collected. For the purpose of profile creation, we act as the data controller. The legal basis for processing personal data (except for platform activity) is **performance of a contract**. For tracking User activity on the platform, the legal basis is **consent**. If you respond to a Customer's (Employer's) job offer by submitting personal data in a form, the Customer becomes the data controller and we act as the processor.

| Category | Personal Data Processed | Purpose of Processing |
|----------------------------|--|---|
| Identification Data | Email address | Creation and management of the user profile |
| Contact Data | Phone number, first name, surname, photo | To enable contact between User and employers |
| Career Information | Job-seeking status, About Me section, Motivation section, LinkedIn, GitHub, attachments (CV, cover letters, portfolios, etc.), links | To allow the User to present themselves to employers |
| Job Preferences | Field, type of work, location, expected compensation, seniority, type of employment, form of cooperation, benefits | To customize job offers and recommend relevant listings; to present the User to potential employers |

| | | |
|-----------------------------|--|---|
| Skills | Languages, soft and hard skills | To ensure alignment between the User's skills and employer requirements; to present the User to potential employers |
| Platform Activities* | Search queries, job ads viewed, companies viewed, jobs applied to, results of knowledge tests on StartupJobs | To improve platform functionality and personalize content |

* Applies also to unregistered visitors who consent to tracking their activity on the platform.

Job Applicant

You are a *Job Applicant* if you apply for a specific job advertisement. In this case, we transfer your personal data to the Customer whose job ad you are responding to. The legal basis for processing personal data of Job Applicants is a performance of a contract.

| Category | Personal Data Processed | Purpose of Processing |
|--|------------------------------------|--|
| Identification Data | First name, surname | To identify the individual interested in the platform's services |
| Contact Data | Email address, phone number | To communicate with the applicant |
| Professional Information | Current position, LinkedIn profile | To assess suitability for specific job offers or services |
| Content of Communication (if it includes personal data) | Messages sent via the contact form | To respond to inquiries and provide user support |

Customer (Company)

You are a *Customer* if you register your company on our platform. A company profile is then created, and you become, among other things, the data controller of the personal data we process on your behalf. The legal basis for processing the Customer's personal data is a **performance of a contract**.

The data subject is the natural person to whom the personal data relates. A legal entity is not considered a data subject. Data pertaining to legal entities is therefore not considered personal data.

| Category | Personal Data Processed | Purpose of Processing |
|--|--|--|
| Identification Data | Company name, Company ID number (IČO), VAT ID (DIČ) | Company identification within the system |
| Contact Data | Registered address, contact email, phone number | To enable communication between the platform and the company |
| Billing Data | Bank account information | To process payments for platform services |
| Company Representatives | First name, surname, position, email address, phone number | Communication with responsible company representatives |
| Content of Communication (if it includes personal data) | Messages sent via the platform | Communication with responsible company representatives |

3. COMMERCIAL COMMUNICATIONS AND WITHDRAWAL OF CONSENT

- 3.1. By clicking the ["I Agree"] button during registration or by clicking the ["I Agree"] button when subscribing to our newsletters or other marketing communications, surveys, etc., or by adjusting the relevant notification settings in your user profile, you consent to our use of your electronic contact details. These may be derived from your current or previous use of our services. You also consent to allowing selected third parties to use this information in order to contact you electronically (e.g., via email) with marketing information.
- 3.2. You may unsubscribe from receiving any commercial communications at any time by:
- a) clicking the unsubscribe link provided in the footer of each commercial message;
 - b) updating the settings in your user profile; or
 - c) contacting us using the contact details provided in this Policy.
- 3.3. If you wish to withdraw your consent for other types of processing, such as data processing for advertising targeting and the improvement of StartupJobs' services (including testing and surveys), you may do so by sending a request to support@startupjobs.cz, or by using the relevant settings in your user profile, if available.
- 3.4. Consent to the publication of personal data in testimonials on our website may be withdrawn at any time by contacting us using the details provided in this Policy.

4. HOW LONG WE RETAIN PERSONAL DATA

- 4.1. We retain and process personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy and only to the extent required to meet our legal obligations, resolve disputes, enforce our rights, and protect our interests. Specifically:
- 4.2. Contact person data for Customers is processed for the **duration of the business relationship**, or until the Customer updates the data.
- 4.3. Data collected in response to job advertisements and for subsequent recruitment processes is retained **until the relevant position is filled**. This period may exceed the validity of the Customer's job ad published on the website. If you give your consent, your data may be stored in the Customer's database for up to **5 years** for the purpose of contacting you in case of a similar job opening.

- 4.4. Commercial communications are sent only **until you withdraw your consent** or unsubscribe.
- 4.5. Data processed for marketing purposes, including the sending of commercial messages, advertising targeting, and optimization of StartupJobs' offerings, is retained for the duration of **your consent**. In the case of cookies, data is retained as long as cookie storage is permitted in your browser or site settings, and in accordance with the expiry period of each cookie type. Processing may continue after consent is withdrawn, but no longer than the expiration of the relevant cookie. Cookie-specific retention periods can be found [\[here\]](#).
- 4.6. The retention period for personal data published in testimonials is agreed individually. Based on your consent, StartupJobs will cease processing such data upon withdrawal.
- 4.7. We will take all reasonably necessary steps to ensure that your data is handled securely and in accordance with this Privacy Policy and that no personal data will be transferred to any organization or country unless adequate safeguards for the protection of personal data are in place.

5. YOUR RIGHTS

- 5.1. In accordance with the terms and conditions set out in the GDPR, you have—or may have—the following rights concerning your personal data:

(i) Right of Access

You may request confirmation from us as to whether personal data concerning you is being processed, and if so, you may obtain further information about such processing.

Your right of access shall be exercised in accordance with applicable laws. If your requests are manifestly unfounded, excessive, or repetitive, we may either:

- (i) charge a reasonable fee, taking into account the administrative costs of complying with the request; or
- (ii) refuse to act on the request.

(ii) Right to Erasure (“Right to Be Forgotten”)

You have the right to request that we erase personal data concerning you without undue delay, and we are obliged to delete such data without undue

delay if the relevant conditions under the GDPR are met. Please note that deleting your personal data may prevent us from being able to provide our services to you.

(iii) Right to Rectification

You have the right to request that we rectify inaccurate or incomplete personal data concerning you without undue delay.

(iv) Right to Object

You may object at any time, on grounds relating to your particular situation, to the processing of your personal data.

(v) Right to Restriction of Processing

You have the right to request restriction of the processing of your personal data.

(vi) Right to Data Portability

You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another controller without hindrance from us.

(vii) Right to Withdraw Consent

If processing is based on consent, you may withdraw your consent at any time. Such withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

5.2. If you believe that your personal data has been processed unlawfully, you may contact the CEO of StartupJobs.com directly at **filip@startupjobs.cz**. You also have the right to file a complaint with the competent supervisory authority. In the Czech Republic, this is the **Office for Personal Data Protection (ÚOOÚ)**. A list of competent data protection authorities in the European Union is available at:

👉 https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

5.3. You may exercise all of your rights using the contact details provided in this Policy.

6. CONTROLLER–PROCESSOR RELATIONSHIP

- 6.1. StartupJobs, its Customers, and other third parties that process personal data for StartupJobs in specific ways act either as data controllers or data processors, depending on who determines the purpose and means of processing. The relationship between controllers and processors is governed by this Policy and applicable legal regulations. Any person acting as a data processor may process personal data only in accordance with the instructions of the controller.
- 6.2. Customers and processors using StartupJobs are required, taking into account the state of the art and especially the nature, scope, and purposes of the processing, to implement appropriate technical and organizational measures to ensure adequate protection of all personal data provided to them by StartupJobs.
- 6.3. Customers may provide StartupJobs only with personal data for which they have a lawful reason to process and transmit. The Customer is responsible for ensuring that this obligation is fulfilled and that all transmitted data is up to date. Customers may only process personal data for as long as necessary to fulfill the specific purpose, unless another legal ground for further processing exists.
- 6.4. StartupJobs, the Customer, and other third parties are required in particular to:
 - a) report any facts that could affect the integrity of personal data processing;
 - b) cooperate in ensuring data security, including notification of personal data breaches;
 - c) cooperate in fulfilling the information obligations toward data subjects and in exercising their rights under this Policy;
 - d) comply with the applicable laws when processing personal data.
- 6.5. Processors used by StartupJobs may engage another processor only with prior written consent from StartupJobs. StartupJobs reserves the right to object to the engagement of any sub-processor. Processors must bind all sub-processors to the obligations contained in this Policy. If a sub-processor fails to fulfill their obligations, the original processor remains liable to StartupJobs for the performance of those obligations.
- 6.6. StartupJobs, the Customer, or any other third party is always responsible for its own employees who come into contact with personal data and must ensure they maintain confidentiality, including after processing ends.
- 6.7. Upon the termination of processing of personal data based on any legal ground, StartupJobs, the Customer, or any other third party must destroy the personal data, including all copies thereof.
- 6.8. StartupJobs, the Customer, and any third parties are required to cooperate fully during personal data processing in accordance with this Policy and to provide all necessary information to demonstrate compliance with their obligations. Where necessary,

processors used by StartupJobs must allow audits or inspections by StartupJobs or an independent auditor and must cooperate fully in such audits.

7. FINAL PROVISIONS

- 7.1. The services are not intended for individuals under the age of 15. To the best of our knowledge, we do not collect personal data from individuals under 15 years of age. If you are a parent or guardian and become aware that your child has provided us with personal data, please contact us. If we discover that we have collected personal data from a child without verified parental consent, we will take steps to delete such data from our servers.
- 7.2. We reserve the right to change, modify, supplement, or otherwise update this Privacy Policy at any time and for any reason. Any new version of this Privacy Policy supersedes its previous version as of the effective date of the new version. If you are a registered user and we have your email address, we will inform you of any material changes to this Privacy Policy via email.
- 7.3. If you have any questions regarding this Privacy Policy or our privacy practices, please contact us by email at: support@startupjobs.cz

This Privacy Policy shall enter into force and become effective on **18 July 2025**.